Supplements to ADR 2004-41



"Mitchell, Cleta" <CMitchell@foley .com> 11/19/2004 05:11 PM

To <REwell@fec.gov>, <rkatwan@fec.gov>

cc

bcc

Subject responses to additional questions

History:

This message has been forwarded.

Question re: Board Membership overlap:

During the past 12 years, only one CMIS board member (other than the ex officio memberships of CMIS and CUNA CEOs on each other's organization's board) has also been a member of the CUNA board. That individual was a credit union CEO who had governance interests in both organizations as well as in other components of the credit union community. At present, one of our board members is also a member of the National Association of Federal Credit Unions' (NAFCU) board of directors. NAFCU competes with CUNA for membership by federal credit unions. Any overlapping membership is purely coincidental and an indvidual prerogative related to the individual within the credit union community.

Question re: accounts in credit unions

CMIS does not maintain corporate accounts at 'natural person' credit unions but does have corporate accounts with corporate credit unions, such as U.S. Central Credit Union in Lenexa, KS primarily for participation in credit unions' automated clearinghouse funds processing. A few subsidiary elements of CMIS, such as the CUNA Mutual Foundation, the CUNA Mutual cafeteria, and the CUNA Mutual Insurance Society Political Action Committee, do maintain accounts at CUNA Credit Union, a natural person credit union located in Madison, WI. Regional offices of CUNA Mutual and other elements of the organization may also have small accounts for miscellaneous purposes at individual credit unions, but, to the extent that they exist at all, they do not form part of the CMIS financial management network. Nor could they reasonably serve as a means of influencing CUNA's policy or operations, any more than do other account holders out of the 86 million credit union members throughout the United States.

now checking the question re: officers

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"Mitchell, Cleta" <CMitchell@foley .com> 11/19/2004 07:44 PM

To <REwell@fec.gov>, <rkatwan@fec.gov>

CC

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Subject Additional question re: officers

History:

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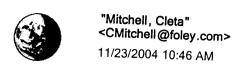
Response to question re: officers: The following statement is true and correct:

No CUNA Mutual / CMIS employee is or has been in the past 12 years a member of the other entity's board, other than the president's ex officio status previously discussed.

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To <bdeutsch@fec.gov>

СС

bcc

Subject CMIS officers

Bottom line: there is no officer of either entity (CMIS or CUNA) who has served as an officer of the other entity during the past twelve years.

Please let me know if you need further information. Thank you. Cleta Mitchell,

Sent from my BlackBerry Wireless Handheld (www.BlackBerry.net)

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